



COURT PLAZA NORTH
25 MAIN STREET
P.O. BOX 800
HACKENSACK, NJ 07602-0800
201-489-3000 201-489-1536 FAX

David M. Kohane
MEMBER
ADMITTED IN NJ, NY AND CT

Reply to New Jersey Office
WRITER'S DIRECT LINE: 201-525-6267
WRITER'S DIRECT FAX: 201-678-6267
WRITER'S E-MAIL: DKOHANE@COLESCHOTZ.COM

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NEW YORK

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TEXAS

September 19, 2012

Via ECF

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
M.L. King, Jr. Federal Bldg. & Courthouse
50 Walnut Street, Room 4040
Newark, NJ 7101

Re: Katalyst Beverage Corporation adv. Starco Impex, Inc., et al.
Civil Action No.: 10-5521 (JLL)(CLW)

Dear Judge Waldor:

We represent defendants Starco Impex, Inc. d/b/a Wholesale Outlet, USA Millennium GP, USA Millennium, LP, and M. Tahir Javed (the "Starco Defendants"). With the consent of counsel to plaintiff Katalyst Beverage Corporation, the Starco Defendants respectfully submit the attached proposed Discovery Confidentiality Order and Certification in Support of Proposed Discovery Confidentiality Order Pursuant to L. Civ. R. 5.3(b)(2) for Your Honor's consideration and entry.

The parties are available to discuss this matter in further detail at Your Honor's request.

Respectfully submitted,

/s/ David M. Kohane

David M. Kohane

DMK:ngm

cc: Robert Schoenberg, Esq. (via ECF and E-mail)
Peter S. Sloane, Esq. (via E-mail)
Cameron Reuber, Esq. (via E-mail)
Michael R. Yellin, Esq. (via E-mail)
Nicole G. McDonough, Esq. (via E-mail)